

# **Exhibit 4**

**(Document Sought to be Sealed)**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC., )  
Plaintiff, ) Case No.  
vs. ) CV 10-03561 WHA  
GOOGLE, INC., )  
Defendant. )  
\_\_\_\_\_ ) VOLUME I

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
VIDEOTAPED 30(b)(6) DEPOSITION OF GOOGLE, INC.  
DESIGNEE: FELIX LIN  
Palo Alto, California  
Monday, December 14, 2015

Reported by:  
KELLI COMBS, CSR No. 7705  
Job No. 2196295  
Pages 1 - 184

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[illegible]

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[REDACTED]

MR. RAGLAND: Objection; outside the scope  
and form.

10:09:59AM

I'll also take this opportunity to  
designate the transcript as Highly Confidential,  
Attorneys' Eyes Only subject to review, as we've  
been doing in other depositions.

THE WITNESS: What was the question again?

10:10:09AM

[illegible]

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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[REDACTED]

[REDACTED]

1 [REDACTED] 10:13:14AM  
2 BY MS. HURST:  
3 Q But you have been able to create a  
4 solution that will allow Android applications to run  
5 on Chrome OS, true? 10:13:22AM  
6 MR. RAGLAND: Objection to form and  
7 outside the scope.  
8 THE WITNESS: We've managed to get some  
9 Android applications running on Chrome OS.  
10 BY MS. HURST: 10:13:35AM  
11 Q And the -- are you familiar with  
12 ARC Welder?  
13 A Yes.  
14 Q What is ARC Welder?  
15 MR. RAGLAND: Objection; outside the 10:13:43AM  
16 scope.  
17 THE WITNESS: ARC Welder is a tool that  
18 allows application developers to try to get their  
19 applications running on Chrome OS.  
20 BY MS. HURST: 10:13:52AM  
21 Q And why did you create ARC Welder?  
22 MR. RAGLAND: Same objection.  
23 THE WITNESS: We wanted to make it  
24 possible for application developers who were  
25 familiar and had built Android applications to make 10:14:02AM



1 encourage developers to write for the form factor, 10:15:09AM  
2 so they don't necessarily offer the best solution by  
3 simply taking a device -- an application written for  
4 a phone and running it on a -- on a larger display.

5 BY MS. HURST: 10:15:22AM

6 Q So then why not simply encourage them to  
7 develop for Chrome OS devices? I mean, why offer  
8 ARC Welder at all?

9 A We do.

10 MR. RAGLAND: Objection to form and 10:15:31AM  
11 outside the scope.

12 THE WITNESS: We do.

13 BY MS. HURST:

14 Q And have you been successful in getting  
15 many developers of Android applications to port them 10:15:36AM  
16 over to Chrome OS?

17 MR. RAGLAND: Same objections.

18 THE WITNESS: We've seen some success,  
19 yes.

20 BY MS. HURST: 10:15:45AM

21 Q Can you approximate how many Android  
22 applications have been ported over to Chrome OS  
23 without use of ARC Welder?

24 MR. RAGLAND: Objection to form and  
25 outside the scope. 10:15:53AM

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BY MS. HURST:

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Q Would you agree that major platform

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providers in the marketplace are working towards the

10:20:32AM

Page 25

1 the scope. 10:24:00AM

2 THE WITNESS: I see different strategies

3 for different companies playing out.

4 BY MS. HURST:

5 Q My question now is: Thinking forward and 10:24:20AM

6 projecting into the future with the goals for

7 Google, wouldn't you like to have a unified

8 experience for your customers, that is, end user

9 customers, across any device that they may choose to

10 use? 10:24:35AM

11 MR. RAGLAND: Objection to form, outside

12 the scope.

13 THE WITNESS: Google tries to make its

14 applications available on all platforms, yes.

15 BY MS. HURST: 10:24:44AM

16 Q And how does Google make money?

17 MR. RAGLAND: Objection; outside the

18 scope, form.

19 THE WITNESS: Today, Google primarily

20 makes money from advertising. 10:24:57AM

21 BY MS. HURST:

22 Q And in what forms does Google deliver the

23 advertising from which it makes that money?

24 MR. RAGLAND: Same objections.

25 THE WITNESS: Largely online. 10:25:08AM

1 BY MS. HURST: 1:28:38PM

2 Q Did Exhibit 5089, this article, did it  
3 prompt any discussion on your part with anybody else  
4 at Google about the information contained therein?

5 MR. RAGLAND: Objection to form and beyond 1:28:48PM  
6 the scope.

7 THE WITNESS: Other -- other people on the  
8 team saw it. I think, in general, people thought it  
9 was an interesting analysis but, you know, there  
10 wasn't really any discussion beyond that. 1:29:05PM

11 MS. HURST: Exhibit 5090 is a Wall Street  
12 Journal article dated October 29, 2015, entitled  
13 "Alphabet's Google to Fold Chrome Operating System  
14 into Android."

15 (Deposition Exhibit 5090 marked 1:30:02PM  
16 for identification.)

17 BY MS. HURST:

18 Q Mr. Lin, did you read this article on or  
19 about the time it was published?

20 A I did. 1:30:30PM

21 Q And what was your reaction to it at the  
22 time?

23 MR. RAGLAND: Objection; outside the  
24 scope.

25 THE WITNESS: My impression was that 1:30:44PM

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[illegible]

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BY MS. HURST:

1:34:06PM

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Q What was the goal of creating ARC Welder?

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MR. RAGLAND: Objection to scope.

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THE WITNESS: Are you asking about the

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technical goal or what -- what do you mean?

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BY MS. HURST:

1:35:09PM

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Q Well, let's start with the technical goal.

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MR. RAGLAND: Same objection, also to

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form.

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THE WITNESS: The technical goal was to

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just make it easier for application developers to

1:35:16PM

21

put the finishing touches on Android applications so

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that they could run on Chrome OS.

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BY MS. HURST:

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Q What were the bus- --

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What was the business goal or goals of

1:35:26PM

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BY MS. HURST:

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Q Is there some version of Android that's

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API-level version that's been released where ARC

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does support all of the libraries?

1:42:19PM

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MR. RAGLAND: Same objections.

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THE WITNESS: I don't know that we have

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produced that or that it's been made available, no.

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BY MS. HURST:

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Q Which -- which libraries are not

1:42:33PM

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1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby certify:

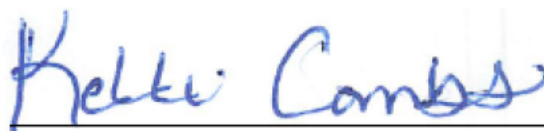
3 That the foregoing proceedings were taken  
4 before me at the time and place herein set forth; that  
5 any witnesses in the foregoing proceedings, prior to  
6 testifying, were administered an oath; that a record of  
7 the proceedings was made by me using machine shorthand  
8 which was thereafter transcribed under my direction;  
9 that the foregoing transcript is a true record of the  
10 testimony given.

11 Further, that the foregoing pertains to the  
12 original transcript of a deposition in a Federal Case,  
13 before completion of the proceedings, a review of the  
14 transcript [X] was [ ] was not requested.

15 I further certify I am neither financially  
16 interested in the action nor a relative or employee of  
17 any attorney or any party to this action.

18 IN WITNESS WHEREOF, I have this date  
19 subscribed my name.

20  
21 Dated: 12/16/2015

22  
23   
24

KELLI COMBS

25 CSR No. 7705